



George S. Mahaffey

gsm@gdldlaw.com

Direct 410-783-4993

Admitted in Maryland,

District of Columbia & Pennsylvania

One South Street, 20th Floor

Baltimore, Maryland 21202

T| 410-783-3550 F| 410-783-3530

April 4, 2023

VIA ECF:

The Honorable Catherine C. Blake
United States District Judge
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *Andrews v. Baltimore Police Department, et al.,*
Civil Action No. 16-cv-2010-CCB

Dear Judge Blake:

We write to provide the Court with an updated Joint Status Report in the above-referenced matter.

Discovery has concluded aside from the resolution of various outstanding discovery requests which the Parties are working diligently to resolve. In addition, Plaintiff continues to request certain documents from L3 Harris that are highly relevant to the information sought by the Fourth Circuit, including but not limited to, the operator's manual for the cell-site simulator at issue. We anticipate meeting and conferring again on the issue with L3 Harris in the hope of not involving the Court in this issue.

Counsel jointly requests the Court enter an Order requesting an updated Status Report by May 15, 2023. Should the Court have any questions or concerns, the Parties will make themselves available at the Court's convenience.

Respectfully yours,

/s/ George S. Mahaffey Jr.

George S. Mahaffey Jr.
Michael Pichini

cc: Counsel of Record (via ECF)

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